

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re: Vitamin Antitrust Litigation

Misc. No. 99-0197 (TFH) (AK)
MDL No.1285

FILED

MAR 13 2002

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

This document relates to:
ALL ACTIONS

**STIPULATION AND ~~PROPOSED~~ ORDER REGARDING DEGUSSA AG'S
RESPONSE TO PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF
TRAVEL AND EXPENSE REPORTS FOR DEGUSSA AG CONSPIRATORS**

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the
undersigned:

1. Degussa AG shall have until March 19, 2002 to file and serve its
opposition to Plaintiffs' Motion to Compel Production of Travel and Expense Reports for
Degussa AG Conspirators ("Motion");
2. Plaintiffs shall have until April 5, 2002 to file and serve their reply brief in
further support of the Motion; and
3. Nothing in this Stipulation shall be deemed to waive any defense of
Degussa AG, including specifically, but without limitation, insufficiency of service of
process and lack of personal jurisdiction.

Dated: March 8, 2002

Respectfully submitted,



Peter E. Halle (D.C. Bar No. 221499)

Thomas J. Lang (D.C. Bar No. 452398)

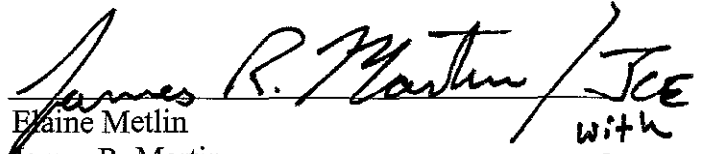
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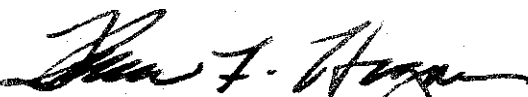
2101 L Street, NW

Washington, D.C. 20037-1526

with
permission

On behalf of all plaintiffs for purposes of this
Stipulation

SO ORDERED:



The Honorable Thomas F. Hogan

Chief Judge

United States District Court

for the District of Columbia

Dated:

3/12/02